



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

REPLY TO
ATTENTION OF

Base Realignment and Closure Division

OCT 06 2016

Environmental Protection Agency
Office of Enforcement, Compliance, and Environmental Justice
Attn: Kelly Bunker
Region 3 PCB Coordinator
1650 Arch Street
Philadelphia, Pennsylvania, 19103

Dear Ms. Bunker:

The purpose of this letter is to provide the Environmental Protection Agency with notification of a Polychlorinated Biphenyls (PCB) Self-Implemented Clean-up action at the former Walter Reed Army Medical Center (WRAMC), located at 6900 Georgia Ave, NW Washington DC.

As part of the Base Realignment and Closure Process, the WRAMC's Caretaker Environmental Office (CEO) conducted sampling to determine if a transformer vault northeast of WRAMCs Building 11 was contaminated by PCBs. The vault is constructed of concrete and had evidence of a drain in the past. The drain has been sealed. The vault contains an active PCB contaminated transformer. In September 2016, the transformer leaked approximately 15 gallons of PCB contaminated fluid onto the vault surfaces. The transformer was then drained of all fluid following the leak. This property will be transferred to the District of Columbia Local Redevelopment Authority (DCLRA) for reuse as a school in 2016. See Figure 1 for a site map and location of the transformer. There are no known or documented PCB releases in the area of this vault.

Sampling and Cleaning Event History

In December 2015, the DCLRA's Environmental Phase I consultant sampled the dielectric fluid within Building 11's transformer for PCBs. The sample result was 85 mg/kg, indicating that this a PCB contaminated transformer.

In April 2016, the CEO collected four wipe samples on the floor of Building 11's transformer vault. Three out of four sample results were above the TSCA allowable limit of 10 $\mu\text{g}/100\text{ cm}^2$. Wipe samples were collected in accordance with (IAW) the standard wipe test definition described in 40 CFR 761.3 and 761.123. See Table 1 below for the results.

Table 1. Pre-clean up sample results.

Sample Number	Result ($\mu\text{g}/100\text{ cm}^2$)
PV-13	Non-Detect (<5.0)
PV-14	12

PV-15	11
PV-16	44

Due to these elevated levels, in June 2016 the CEO cleaned the transformer and transformer vault surfaces. All four walls, the floor and the transformer were cleaned using the double wash/ rinse methodology using kerosene as a solvent. After the cleaning event, four wipe samples were collected on the floor, walls and each side of the actual transformer (total of 12 samples). Three of the floor samples remained above 1 $\mu\text{g}/100\text{ cm}^2$, one wall sample was above 1 $\mu\text{g}/100\text{ cm}^2$ and the others were non-detect (ND). See Table 2 below for post clean-up results.

Table 2. Post Cleaning Results.

Sample Number	Sample Location	Result ($\mu\text{g}/100\text{ cm}^2$)*
F-37	Wall	ND
F-38	Wall	5.2
F-39	Wall	ND
F-43	Wall	ND
F-42	Floor	180
F-44	Floor	7.8
F-45	Floor	6.4
F-48	Floor	ND
F-05	Transformer	ND
F-06	Transformer	ND
F-07	Transformer	ND
F-08	Transformer	ND

*ND = $<5.0\text{ }\mu\text{g}/100\text{cm}^2$

In July 2016, to determine if there was a release of PCBs, soil surrounding the transformer vault was sampled for PCBs. Eight samples were collected, from four locations. All soil results are below detectible levels and screening criteria, which indicates that there was not a release of PCBs into the environment. See Table 3 below for results.

Table 3. Soil Sample Results

Location	Sample Depth	Result ($\mu\text{g}/\text{kg}$)
A	11.8 - 12.3	<20.2
A	13.1 - 13.6	<19.2
B	11.8 - 12.3	<18.0
B*	11.8 - 12.3D	<18.1

B	13.2 - 13.8	<19.2
C	12.5 - 13.0	<20.7
C	13.2 - 13.8	<18.5
D	12.1 - 12.7	<22.3
D	13 - 13.8	<21.0

*Duplicate Sample

In September 2016, during a sampling event the transformer leaked PCB contaminated fluid on to the vault surfaces. The transformer will be removed from the vault, and will be disposed of as PCB waste appropriately. At this time, the future owners plan to replace the transformer and reuse the vault.

Conclusions and Future actions

Due to the transformer fluid leak, the vault surfaces will be cleaned using the double wash/ rinse methodology using a solvent.

In accordance with PCB Remediation guidance (40 CFR 761.30(p)), the walls and floors of the transformer vault will be encapsulated using two coats (contrasting colors) of epoxy paint for the walls and poured epoxy resin for the floor. Each coat of the epoxy resin will be approximately 1/8 inch thick, leaving 1/4 inch thick solvent resistant and water repellent encapsulation.

Once the encapsulation process is complete, the vault surface will be labeled the appropriate ML PCB Contamination label. The deed transferring the property will include a notice of PCB contamination and a requirement that the notice be included in future transfers.

The CEO believes the described processes above comply with PCB remediation clean-up actions related to on-site clean-up of PCB remediation waste where the area to be cleaned will continue to be used (40 CFR 761.30(p)).

The CEO is requesting concurrence with the above actions. If you have any questions, please contact Erin Mauer at 202-812-7398, and at Erin.C.Mauer.Civ@mail.mil.



Markus Craig
Program Manager, BRAC Division

Enclosure

Enclosure

Figure 1: Site Map

